

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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IN RE:	:	
Tanya L. Cain	:	Case No.: 17-16840-amc
Timothy D. Cain	:	
Debtor	:	Chapter 13

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**MOTION TO MODIFY PLAN AFTER CONFIRMATION**

The Debtors, Tanya and Timothy Cain, by and through their undersigned counsel, hereby move to modify their Chapter 13 Plan and in support thereof aver as follows:

1. Debtor filed a Chapter 13 Bankruptcy on or about October 6, 2017.
2. The Chapter 13 filing was assigned case number 17-16840.
3. The Chapter 13 Plan was confirmed by this Honorable Court on or about June 20, 2018.
4. On or about October 29, 2020 the Debtors and CitiMortgage, Inc. c/o Cenlar FSB, entered into a Stipulation resolving the pending Motion for Relief.
5. Per the Stipulation, the Debtors are delinquent in the sum of \$3,956.60 in post-petition payments. A true and correct copy of the Stipulation is attached hereto as **Exhibit "A."**
6. The Debtors fell behind in their payments to the creditor due unforeseen household expenses coupled with a decrease in hours and income for Debtor wife as a result of COVID-19.
7. The Debtors have since remedied the household issues and Debtor wife has returned to work full-time.
8. In accordance with the Stipulation, the Debtors will cure the subject \$3,956.60 by amending the Chapter 13 plan.

9. In furtherance of the Stipulation and the Debtors curing the post-petition delinquency, this Motion and Modified Chapter 13 Plan are being contemporaneously filed.

10. The Debtor's proposed modified Chapter 13 Plan, attached hereto as "**Exhibit B**", is affordable to the Debtor.

**WHEREFORE**, the Debtors request that they be permitted to modify their Chapter 13 Plan for the above-stated reasons.

Dated: November 2, 2020

/s/Brad J. Sadek, Esq  
Brad J. Sadek, Esq.  
Attorney for Debtor  
1315 Walnut Street  
Suite #502  
Philadelphia, PA 19107